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Attorneys for Defendants Oxnard School District,
Cesar Morales, Ernest Morrison, Debra Cordes,
Denis O'Leary, Veronica Robles-Solis, and
Monica Madrigal Lopez

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

J.R., a minor, by and through her
guardian ad litem, Janelle McCammack;
M.B., a minor, by and through her
guardian ad litem, F.B.; I.G., a minor, by
and through his guardian ad litem, M.E.,
on behalf of themselves and all those
similarly situated,

Plaintiffs,

v.

OXNARD SCHOOL DISTRICT;
CESAR MORALES, Superintendent of
Oxnard School District, in his official
capacity; ERNEST MORRISON,
President of the Board of Trustees, in his
official capacity; DEBRA CORDES,
Clerk of the Board of Trustees, in her
official capacity; DENIS O'LEARY,
Trustee of the Board of Trustees, in his
official capacity; VERONICA ROBLES-
SOLIS, Trustee of the Board of Trustees,
in her official capacity; MONICA
MADRIGAL LOPEZ, Trustee of the
Board of Trustees, in her official
capacity; and DOES 1 TO 10, inclusive

Defendants.

Case No.: 2:17-cv-04304-JAK-FFM

**JOINT STIPULATION FOR A 60 DAY
STAY TO FURTHER EXPLORE
SETTLEMENT**

**TO THE COURT AND TO ALL PARTIES AND THEIR COUNSEL OF
RECORD:**

This stipulation is entered into by Plaintiffs M.B., I.G., F.S., W.H., I.B., M.L., D.C., and A.E., and Primero Los Niños, by and through their respective guardians ad litem and their counsel (collectively, “Plaintiffs”), and Defendants Oxnard School District, Cesar Morales, Ernest Morrison, Debra Cordes, Denis O’Leary, Veronica Robles-Solis, and Monica Madrigal Lopez (collectively, “Defendants”), by and through their counsel, with reference to the following facts and recitals:

WHEREAS, this Court issued an Order continuing all litigation deadlines on August 16, 2019 (Docket No. 268),¹ with the following dates:

November 8, 2019: Non-Expert Discovery Cut-Off

November 8, 2019: Initial Expert Disclosures

November 22, 2019: Rebuttal Expert Disclosures

December 20, 2019: Expert Discovery Cut-Off

January 13, 2020: Last Day to File All Motions (including discovery motions)

WHEREAS, the Court indicated in its August 16, 2019 scheduling order that no further continuances will be granted absent compelling circumstances;

WHEREAS, the parties had a settlement meeting with counsel for the parties on September 17, 2019;

WHEREAS, the parties attended a Mandatory Settlement Conference with Magistrate Judge Patrick J. Walsh (hereinafter, “Judge Walsh”) on September 30, 2019;

WHEREAS, the parties have made significant progress towards settlement with the assistance of Judge Walsh;

¹ Prior Scheduling Orders are located at Docket No. 103, Docket No. 130, Docket No. 166, and Docket No. 244.

1 WHEREAS, the parties conceptually agreed to a settlement framework at the
2 conclusion of the September 30, 2019 mandatory settlement conference with Judge
3 Walsh;

4 WHEREAS, a component of the parties' settlement requires that the parties
5 designate a third party consultant;

6 WHEREAS, the parties are in the process of identifying who the third-party
7 consultant will be, and the precise parameters of the consultant's role;

8 WHEREAS, the parties will participate in a further telephonic settlement
9 conference with Judge Walsh on October 15, 2019;

10 WHEREAS, the parties intend to engage in ongoing settlement discussions in the
11 next 60 days, with the assistance of Judge Walsh as necessary;

12 WHEREAS, both parties believe additional time is necessary in order to explore
13 and potentially reach a resolution to this matter without incurring additional attorneys
14 fees and costs on discovery and expert reports;

15 THEREFORE, the Parties, through their undersigned counsel, hereby agree and
16 stipulate, subject to the approval of the Court, that the matter, including all discovery,
17 should be stayed for 60 days to allow the parties to continue to negotiate and finalize the
18 settlement.

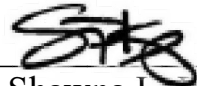
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20 Dated: October 3, 2019

GARCIA HERNANDEZ SAWHNEY, LLP

21
22 By: /s/Norma Nava Franklin
23 Norma Nava Franklin
24 Attorneys for Defendants
25 Oxnard School District, Cesar Morales,
26 Ernest Morrison, Debra Cordes,
27 Denis O'Leary, Veronica Robles-Solis, and
28 Monica Madrigal Lopez

1 Dated: October 3, 2019

LAW OFFICES OF SHAWNA L. PARKS

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3 By: 
4 Shawna L. Parks, Esq.
5 Attorneys for Plaintiffs
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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on October 3, 2019, I caused a true and correct copy of the foregoing **JOINT STIPULATION FOR A 60 DAY STAY TO FURTHER EXPLORE SETTLEMENT** to be electronically filed with the Clerk of the District Court using the CM/ECF system, which sent notification of such filing to counsel for all parties.

Dated: October 3, 2019

By: /s/Norma Nava Franklin